

Rockland County, New York



Narrowbanding Waiver Request Submitted to the Federal Communications Commission November 15, 2011

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Introduction

The Licensee requesting the waiver from narrowbanding by the January 1, 2013 deadline resides in Rockland County, NY. Rockland County is currently implementing a county-wide Public Safety Communications Network. This will operate in the 700 MHz frequency band and will provide the highest level of interoperability for county public safety agencies as defined by the Homeland Security Interoperability Continuum and has been designed to be the most spectrally efficient radio system possible, utilizing trunking technology, 12.5 KHz channel bandwidth, and TDMA technology. Rockland's county-wide network will be used to support public safety communications and interoperability for law enforcement, EMS, fire departments, and other emergency agencies, including the Licensee. The network will be providing communications services for approximately 3,550 subscribers. Furthermore, Rockland County has made significant progress towards the implementation of the 700 MHz network as shown in Section 2 of this document and the timetable provided in Section 9.

However, Rockland County realizes that even though they have been working diligently and in good faith towards meeting their goal of finalizing all pending aspects of their 700 MHz network by the established narrowbanding deadline of January 1, 2013, the possibility of not having the proposed system operational and all agencies transitioned by the deadline exists. Rockland's concern arises mainly due to the fact that the following critical path items are still pending:

- Completion of the Dispatch Center that will house the dispatch consoles, the radio system Master and Prime site equipment.
- Obtaining lease agreements for 4 of the 10 proposed sites.
- Obtaining building permits for 6 of the 10 proposed sites (1 pending state approval of Green Acres in NJ, 4 pending zoning approval, 1 in progress).
- Obtaining local zoning approval for 4 sites.
- The transition of approximately 3000 users from existing systems to the new 700 MHz network.

Rockland County, in anticipation of the unlikely event of having one or more of the above mentioned items delay the launch of their 700 MHz system, has notified the Licensee of the risk of not meeting the narrowbanding deadline. Therefore, the Licensee is requesting a six (6) month waiver from the narrowbanding deadline of January 1, 2013 due to *"the unique and unusual factual circumstances of the case, the application of the rule would be inequitable, unduly burdensome and contrary to the public interest."*

The Licensee believes the granting of this waiver would be in the public interest, specifically, the interest of the 311,687 people who reside in Rockland County and rely on the continuous operation of all public safety agencies in the county. Below is a point-by-point review of several potentially relevant factors in assessing whether the Licensee has legitimate reasons for requesting a waiver.

1. Scale and complexity levels of the Licensee's existing system and the proposed County Wide 700 MHz network.

The Licensee is currently an entity with several mobiles, portables and base stations, operating in the VHF/UHF frequency band, that would require reprogramming or replacement to be narrowband compliant. Rather than the Licensee, and every other Public Safety Licensee in Rockland County, spending a total sum of over \$6 Million dollars narrowbanding their current networks, and continuing to have interoperability issues, the decision was made to join together and participate in the County's new 700 MHz network. Hence the issue of complexity is related to the timely implementation of the new county-wide network which will provide service to over 3,000 public safety subscribers.

Rockland County's proposed network will be used to support public safety communications and interoperability for various police departments, fire departments, and emergency medical services of the five (5) towns, nineteen (19) incorporated villages, and many other unincorporated hamlets. The public safety agencies involved include the following:

- Twelve (12) law enforcement agencies
- Twenty (20) EMS agencies
- Twenty six (26) fire departments
- Rockland County Agencies
 - Office of Fire & Emergency Services
 - Sheriff's Department
 - Narcotics Task Force
 - R.E.A.C.T. Team
 - Intelligence Unit
 - HazMat Team
 - Technical Rescue Team
 - Rescue Helicopter
 - Bomb Squad

The county-wide network will be composed of a Dispatch Center, a loop microwave system and a 10 site, 10 channel simulcast trunked P25 Phase 2 TDMA compliant network. Implementing such a complex network has presented many challenges for the implementation team, resulting in delays, which has created concerns by the Licensee regarding compliance with the narrowband deadline for the Licensee's current system. These concerns have triggered the request for a waiver request.

2. Steps taken to plan for, initiate, and complete the transition to narrowband operations

Rockland County Licensees reviewed the current network deficiencies more than six (6) years ago and put a plan in place to address interoperability issues, provide enhanced features, improve in-building coverage, migrate the Fire Departments away from Low Band and to address the mandate to narrowband. In 2009 when it was foreseen that the new network had experienced delays due to various obstacles, the County reviewed the option of narrowbanding all agencies in order to meet the narrowbanding deadline. Inventories of all the radio equipment were gathered and the cost estimate to narrowband all applicable agencies was \$6,000,000. Since the narrowbanding effort did not alleviate all of the other communication shortfalls facing the County, it was decided that the County would put all of their efforts into getting the new network ready prior to January 1, 2013.

As of today, Rockland County has completed the radio coverage design and site selection process for their county-wide Public Safety Communications Network. There is an executed contract with Motorola to provide the equipment. In order to expedite the process, the County also increased Motorola's contract to include site construction services, with the thought that if one vendor had responsibility for the entire project, it could be run more efficiently and effectively. The site acquisition process for the 10 proposed sites is nearly complete and several sites are currently in the construction phase.

Originally, Rockland County was going to build the network utilizing UHF spectrum. With the availability of the new 700 MHz allocations, the County applied for 700 MHz frequencies in 2009. In May of 2011 the County received Regional Planning Committee approval for coordination. The County immediately applied for the required Federal Communications Commission license and is currently waiting for grant of such license. As of September 2nd 2011, the radio equipment has been ordered and Rockland County is estimating the proposed 700 MHz system to be operational as early as October 2012.

3. Rockland County's system capability for narrowbanding

The Licensee, along with other Rockland's agencies, currently operates a VHF/UHF system which is approximately 25 % narrowband capable. The other 75 % of the radio equipment is not narrowband capable. Consequently, a majority of the current radio equipment would have to be replaced. The cost to replace all the non-compliant radio equipment for all the individual agencies would be in excess of \$6,000,000 dollars, and even after the upgrade, the shortfalls of interoperability and system performance would not be resolved. Rockland County expects their proposed network to provide a common platform for all county first responders, as well as the highest degree of interoperability as defined by the Homeland Security Interoperability Continuum. Therefore, Rockland County and

it's agencies have opted for replacing the old systems with the proposed 700 MHz communications network.

4. Additional system upgrades or improvements in addition to converting to narrowband operation

As discussed above, the Licensee, Rockland County and it's agencies have opted for a complete system upgrade as opposed to narrowbanding the existing inadequate systems.

5. Funding sources

Through multiple avenues, Rockland County has appropriated the necessary funds for the design and construction of their proposed 700 MHz County Public Safety Communication System.

6. Narrowbanding schedule and interoperability relationships between neighboring systems or other interdependencies

Given the waiver request is for a short extension of time to ensure the new 700 MHz network is fully operational before transitioning users, Rockland County does not anticipate any issues with interoperability relationships or interdependencies.

7. Plans to minimize the negative impact of extended wideband operations on co-channel and adjacent channel operations

Given the waiver request is for a short extension of time to ensure the new 700 MHz network is fully operational before transitioning users, Rockland County does not anticipate any issues with the minimal additional time (if required) of wideband operation.

A search of the available spectrum in and around Rockland County reveals that there are virtually no frequencies available. This includes all the narrowband assignments. Therefore other agencies are currently licensed for the narrowband assignments adjacent to the Licensee's frequencies. Therefore, any interference generated to these narrowband assignments by the Licensee today, will remain unchanged for a short period of time, if the licensee can not transition to the New 700 MHz network by January 1, 2013. If the transition occurs on time, then there will be no negative impact to other agencies.

8. Plans to migrate to a non-VHF/UHF band

Rockland County's plan is to migrate to a non-VHF/UHF band, specifically, the 700 MHz band. The initial network design utilized nine (9) narrowband T-Band UHF channels. As part of the 700 MHz application to the Regional Planning

Committee, Rockland County will be relinquishing seven (7) of these channels. Rockland County intends to utilize two (2) of these channels for paging capabilities. Therefore, the remaining seven (7) T-Band UHF channels will be placed back into the general pool for re-distribution.

9. Time for Transition to 700 MHz County-wide Communication System

Dates	Activities
2005	County Wide Network began with RFP and bid award
September 2007	Contracts were executed and site selection began for a 10 site 9 channel UHF system
November 2007	Motorola updated the design to current technology platform and added a 10 th site to the coverage design
December 2007	Site leasing began
January 2010	Submitted 700 MHz application
April 2010	Evaluate narrowbanding in lieu of County Wide Network
December 2010	Secured all funding and added site construction services to Motorola contract
May 2011	Received Regional Planning committee approval of 700 MHz frequencies and generate FCC application. Site construction begins on 1 st site, permits expected shortly for 3 additional sites
June 2011	Construction starts on new Dispatch Center
September 2011	Equipment order placed, 4 site in construction
December 2011	Equipment staging process. Execute remaining site leases and continue zoning approval process.
June 2012	Dispatch Center construction to be completed
January 2012 – July 2012	Complete zoning and permit process for remaining sites.

	Begin shipping equipment Install equipment for sites that have been completed construction.
July 2012	Microwave system optimization & acceptance
August 2012	Install consoles, Master site and Prime site in new Dispatch Center
September 2012	Site optimization, coverage tests and acceptance
October 2012	Final system acceptance
November and December 2012	Transition all users from existing systems to the new 700 MHz network.

10. Outstanding Items

- FCC granting of 700 MHz licenses
- Lease agreements for 4 sites, specifically,
 - East View
 - Lamont
 - Sloatsburg
 - Bear Mountain
- Building permits for 6 sites, specifically,
 - East View
 - Lamont
 - Sloatsburg
 - Bear Mountain
 - Stag Hill
 - Mountain View

11. Trunked Public Safety 700 MHz Application

Trunked Public Safety 700 MHz - 0004803164 - ROCKLAND, COUNTY OF

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MAIN	ADMIN	TRANS LOG	SERVICE SPECIFIC	LOCATIONS	FREQUENCIES
File Number	0004803164			Radio Service	SY - Trunked Public Safety 700 MHz
Call Sign				Application Status	2 - Pending
General Information					
Application Purpose	AM - Amendment			Original Application Purpose	NE - New
Existing Radio Service					See Full Filing History
Authorization Type	Regular			Emergency STA	
Receipt Date	08/19/2011			Action Date	08/20/2011
Entered Date	08/19/2011			Requested Expiration Date	
Waiver	No			Number of Rules	
Attachments	Yes			Grandfathered Privileges	No
Application Fee Exempt	Yes			Regulatory Fee Exempt	Yes
Major Request	Yes				
Applicant Information					
FRN	0003464856 (View Ownership Filing)			Type	Governmental Entity
Name	ROCKLAND, COUNTY OF 35 FIREMANS MEMORIAL DRIVE POMONA, NY 10970 ATTN OFFICE OF FIRE & EMERGENCY SERVICES				P:(845)364-8900 F:(845)364-8961 E:WRENG@CO.ROCKLAND.NY.US

Trunked Public Safety 700 MHz - 0004803161 - ROCKLAND, COUNTY OF

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Call Sign				Application Status	2 - Pending
General Information					
Application Purpose	AM - Amendment			Original Application Purpose	NE - New
Existing Radio Service					See Full Filing History
Authorization Type	Regular			Emergency STA	
Receipt Date	08/19/2011			Action Date	08/20/2011
Entered Date	08/19/2011			Requested Expiration Date	
Waiver	No			Number of Rules	
Attachments	Yes			Grandfathered Privileges	No
Application Fee Exempt	Yes			Regulatory Fee Exempt	Yes
Major Request	Yes				
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Conclusion

The Licensee and Rockland County have taken all necessary steps to plan for, initiate, and comply with the narrowband deadline designated by the Federal Communications Commission deadline of January 1, 2013. However, as a precautionary measure, Rockland County is herein respectfully requesting a six (6) month narrowbanding deadline waiver. The Licensee and Rockland County believes that they have worked diligently and in good faith to transition the agency systems to the new 700 MHz network expeditiously. However, specific circumstances and risks in the schedule warrants a temporary extension of the deadline and the amount of time which is no more than is reasonably necessary to comply with the narrowbanding mandate. After careful examination of the FCC Public notice DA 11-1189, Section 1.925 of the Commission's rules, and all factual information provided by Rockland County in sections one (1) through nine (9), the Licensee respectfully requests the Federal Communications Commission grant the requested narrowbanding deadline waiver.